

STATE OF COLORADO

COLORADO DEPARTMENT OF HEALTH

Dedicated to protecting and improving the health and environment of the people of Colorado

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Roy Romer
Governor

Patricia A. Nolan, MD, MPH
Executive Director

June 3, 1994

Mr. Richard J. Schassburger
U.S Department of Energy
Rocky Flats Plant
Building 116
P. O. Box 928
Golden, Colorado 80402-0928



000043547

RE: COMMENTS; Draft Technical Memorandum 1 (to Phase I RFI/RI Work Plan) ROCKY FLATS PLANT, 700 AREA (Operable Unit No. 8), April, 1994

Dear Mr. Schassburger,

The Colorado Department of Health, Hazardous Materials and Waste Management Division (the Division) has reviewed the subject document as submitted by DOE and prime contractor, EG&G. Our comments are attached.

The Division finds the information presented to be of value in maintaining or establishing a monitoring effort for Under Building Contamination (UBC) within the industrialized area of the plant. However, the recommendations on foundation drains must be reorganized to focus on the investigation of OU-8 IHSSs. As now organized, the TM neither meets the objective of supporting the characterization of OU-8 nor the determination of nature and extent of contamination resulting from releases at the IHSSs.

In one OU-8 IHSS (138), a release to a storm drain occurred; however, the recommendation is to discontinue sampling at the drain outfall. Concurrently, DOE proposes to add sampling at the outfall of an adjacent Building 779 foundation drain. In this dual recommendation, DOE proposes to replace the collection of valuable data with data of questionable value to the OU-8 investigation. This is not an isolated incident. Generally, sampling recommendations have minimal significance to OU-8 while the potential for contaminant migration adjacent to the lines is overlooked.

Please revise the document to specifically support investigation of OU-8. An objective should be to recommend logical locations for soil borings, as warranted by the nature of releases and the position of drain lines, for inclusion in TM-2.

A-OU08-000100

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If you have any questions concerning the comments or the issues, please contact Harlen Ainscough of my staff at 692-3337.

Sincerely,

A handwritten signature in cursive script, reading "Gary W. Baughman". The signature is fluid and extends to the right.

Gary W. Baughman, Chief
Facilities Section
Hazardous Waste Control Program

Attachment

cc: Daniel S. Miller, AGO
Steve Tarlton, CDH-RFP
Martin Hestmark, EPA
Bill Fraser, EPA
Steve Slaten, DOE
Jim Burd, DOE
Wanda Busby, EG&G
Bruce Peterman, EG&G